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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

MARK MORRISON, an individual;

Plaintiff,

vs.

ULI ZANGPO, an individual;

Defendants.

) **Case No: 3:08-CV-1945-EMC**

) **DECLARATION OF MATTHEW**  
) **KURILICH IN SUPPORT OF**  
) **OPPOSITION TO EXTEND CASE**  
) **MANAGEMENT**

) Date: September 10, 2008

) Time: 10:30 a.m.

) Courtroom: C, 15<sup>th</sup> FLR

**DECLARATION OF MATTHEW KURILICH**

I, MATTHEW KURILICH, hereby declare under penalty of perjury as follows:

1. I, MATTHEW KURILICH, am an attorney at law duly licensed to practice before all courts of the State of California. I am a sole practitioner.
2. I have personal knowledge of the facts set forth herein, and if called upon to do so, I could competently testify to the same.

3. I received a phone call from defendant's counsel, Neil Bloomfield (Bloomfield), on May 12, 2008 asking for a 28-day extension to answer the complaint on June 11, 2008 as Bloomfield stated he had yet to meet with his client and he needed time to answer the detailed complaint.
4. On June 9, 2008, I received a letter from defendant's counsel, Bloomfield, requesting mediation and binding arbitration.
5. On June 10, 2008, I called Bloomfield and had a brief conversation where I granted a second extension to file an answer and further agreed that I would draft and deliver a proposed stipulation for binding arbitration, which was completed via email on June 11, 2008 at 1:46 p.m. (Exhibit 1 Email)
6. In my telephone discussion with Bloomfield, we did not discuss the motion to dismiss or the motion to stay.
7. I spoke with Bloomfield on 6-20-08 for the purpose of complying with meet and confer requirements and he was unavailable to speak so we agreed to continue our conversation later.

Dated: 6-20-08

By: /s/Matthew Kurilich  
Matthew Kurilich,

From: John Crabtree  
Subject: **Morrison v. Zangpo**  
Date: June 11, 2008 1:46:46 PM PDT  
To: Neil Jon Bloomfield  
Cc: Matt Kurilich [mattkurilich@yahoo.com](mailto:mattkurilich@yahoo.com), Mark Morrison Law  
> 1 Attachment, 85.0 KB

Mr. Bloomfield,

At the request of Matt Kurilich and Mr. Morrison, I am forwarding the attached, proposed stipulation, which includes certain edits dictated to me.

If you have any questions, please call Mr. Kurilich. (Please note that I am not counsel for Mr. Morrison).

John G. Crabtree  
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**Exhibit 1**